

FILED

OCT 10 2012

CLERK, U.S. DISTRICT COURT
By V.L.
Deputy

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISIONSPRINGCREST PARTNERS, LLC
D/B/A SPRINGCREST APARTMENTS

VS.

ADMIRAL INSURANCE COMPANY;
ENGLE MARTIN & ASSOCIATES, INC.
AND NICHOLAS J. CIMINO

CIVIL ACTION NO. 4:12-cv-457 - A

**DEFENDANT ENGLE MARTIN & ASSOCIATES, INC.'S MOTION
FOR LEAVE TO PROCEED WITHOUT LOCAL COUNSEL**

COMES NOW, ENGLE MARTIN & ASSOCIATES, INC., Defendant in the above-styled and numbered cause, and files this Motion for Leave to Proceed without Local Counsel and respectfully shows:

1. David Clay Wilkerson, Attorney-In-Charge for Defendants, is admitted to practice law in the State of Texas, and was first admitted to the bar of the Northern District of Texas in 1999. Mr. Wilkerson has been constantly licensed to practice law in the State of Texas and in the Northern District of Texas for over 13 years, and no disciplinary or legal malpractice action of any kind has ever been brought against Mr. Wilkerson. Mr. Wilkerson has familiarized himself with the Local Rules of the Northern District of Texas. Mr. Wilkerson resides 22 miles from Houston and approximately 285 miles from this Honorable Court. There are multiple flights daily between Houston and the Dallas-Fort Worth Airport. Mr. Wilkerson can appear in this Court on same-day notice.

2. Nathan M. Rymer, Attorney-In-Charge for Defendants, is admitted to practice law in the State of Texas, and was first admitted to the bar of this Court on July 27, 1998. Mr. Rymer has been constantly licensed to practice law in the State of Texas and in the Northern District of Texas for over 17 years, and no disciplinary or legal malpractice action of any kind

has ever been brought against Mr. Rymer. Mr. Rymer has familiarized himself with the Local Rules of the Northern District of Texas. Mr. Rymer resides 22 miles from Houston and approximately 257 miles from this Honorable Court. There are multiple flights daily between Houston and the Dallas-Fort Worth Airport. Mr. Rymer can appear in this Court on same-day notice.

3. Counsel have handled many cases in federal court and are familiar with the Federal Rules of Civil Procedure, the Local Rules of this District and Division, and this Court's rules, procedures, and standing orders. Dispensing with the requirement of local counsel would avoid duplication of effort and spare Engle Martin & Associates, Inc. unnecessary expense.

PRAYER

For the reasons cited, Engle Martin & Associates, Inc. respectfully prays that the Court allow it to proceed without designating local counsel.

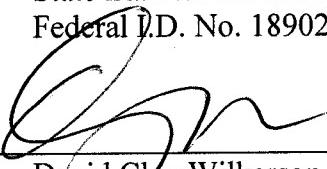
Respectfully submitted,

RYMER, MOORE, JACKSON & ECHOLS, P.C.

By: _____

Nathan M. Rymer
State Bar No. 00792814
Federal I.D. No. 18902

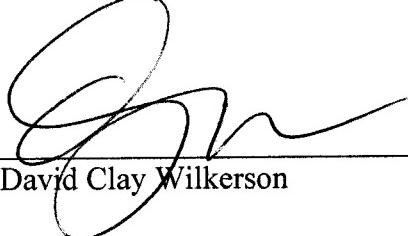
By: _____


David Clay Wilkerson
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Telephone: (713) 626-1550
Facsimile: (713) 626-1558

ATTORNEYS-IN-CHARGE FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

I hereby certify that on October 8, 2012, I corresponded with Sergio Leal, counsel for Plaintiffs, by electronic mail and telephone, and Mr. Leal advised that he is opposed to the filing of the foregoing Motion.



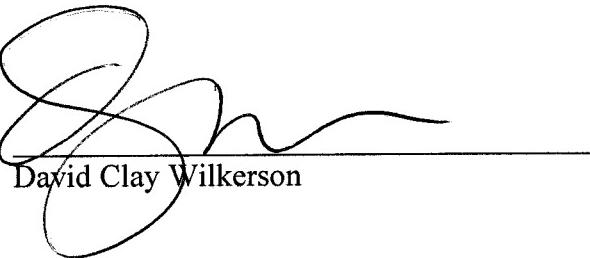
David Clay Wilkerson

CERTIFICATE OF SERVICE

I hereby certify that I have caused a true and correct copy of the foregoing instrument to be served upon the following counsel of record herein by method indicated on this 8th day of October, 2012.

Javier Delgado, Esq.
Sergio V. Leal, Esq.
The Merlin Law Group
Three Riverway, Ste. 701
Houston, TX 77056

Via Certified Mail R.R.R.



David Clay Wilkerson